

2. I hereby certify, that on December 23, 2010, a copy Defendants' Limited Objection to the Report and Recommendation of the Special Master on the Omnibus Issue of *In Pari Delicto* and *Wagoner* was served on counsel of record via the Court's CM/ECF system.

I declare that the foregoing is true and correct.

Dated: New York, New York  
December 23, 2010

/s/ Ross E. Firsenbaum  
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